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October 1, 2020

VIA ECF

The Honorable Margo K. Brodie
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Ng Chong Hwa a.k.a Roger Ng, 18 Cr. 538 (MKB)

Dear Judge Brodie:

We represent Roger Ng in the above-referenced case and write jointly with the government to propose a change to the previously-ordered briefing schedule. (See 8/13/2020 Order.) The dispositive and discovery motion deadlines are currently as follows:

10/2 – Defense Motions Due
10/23 – Government Opposition Due
10/30 – Defense Reply Due

Defense counsel has sent a letter to the Government asking for particulars pursuant to Fed. R. Crim P. 7(f). The Government indicated that they would be able to provide at least some of the information the defense is seeking. Therefore, we seek a two-week adjournment of the motions in order to avoid the need to file a lengthy Bill of Particulars motion.

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The proposed briefing schedule would be as follows:

10/16 – Defense Motions Due

11/6 – Government Opposition Due

11/13 – Defense Reply Due

Additionally, the defense requests leave to file a brief in excess of this Court's 25-page limit. To simplify the filing of motions, counsel plans to combine the dispositive and discovery motions as an Omnibus motion. Therefore, we expect our brief to be in excess of 25 pages.

We thank the Court for its attention to this matter.

Respectfully submitted,



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Zach Intrater, Esq., *Of Counsel*

Teny R. Geragos, Esq.

Jacob Kaplan, Esq.

cc: Counsel for the Government (via ECF)